## UNITED STATES DISTRICT COURT EASTERN DISTRICT OF MICHIGAN SOUTHERN DIVISION

HARTFORD UNDERWRITERS
INSURANCE COMPANY,
TWIN CITY FIRE INSURANCE
COMPANY, HARTFORD FIRE
INSURANCE COMPANY,
PROPERTY AND CASUALTY
INSURANCE COMPANY OF HARTFORD,
TRUMBULL INSURANCE COMPANY, and
HARTFORD CASUALTY INSURANCE
COMPANY,

Case No. 21-cv-11599

Hon. Nancy G. Edmunds,

Mag. Judge Kimberly G. Altman

Plaintiffs,

-vs-

DAVID OTTO,

Defendant.

## **DEFENDANT'S WITNESS LIST**

Defendant David Otto, for his witness list, states that he may call the following witnesses at the trial of this matter:

- 1. David Otto, c/o defendant's counsel.
- 2. Michael Zybura, c/o defendant's counsel.
- 3. Anthony Sabatella, c/o defendant's counsel.
- 4. Van Conway or David Jones, expert witness in forensic accounting, c/o defendant's counsel.
- 5. Expert witness human resources metrics, c/o defendant's counsel.

- 6. Any and all witnesses necessary to establish foundation or authentication for exhibits introduced at trial.
- 7. Any and all witnesses on Plaintiffs' Witness List.
- 8. Any and all witnesses whose identity may be determined during the course of discovery in this case.
- 9. Any and all rebuttal witnesses.
- 10. Any and all expert witnesses identified in this case, consistent with this Court's scheduling order.
- 11. Defendant reserves the right to amend or supplement this Witness List.

Respectfully submitted,

## **ALTIOR LAW, P.C.**

s/ Kenneth F. Neuman
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Dated: April 6, 2022

## **CERTIFICATE OF SERVICE**

I certify that on April 6, 2022, I electronically filed the forgoing paper with the Clerk of the Court using the ECF system which will send notification of such filing to all counsel of record on the ECF Service List.

s/ Kenneth F. Neuman Kenneth F. Neuman (P39429) ALTIOR LAW, P.C.